



No. 16). In its October 12, 2021 Order, the Court declined to address the Xie Parties' motion for partial reconsideration, stating that the Court lacked jurisdiction. (ECF No. 21).

2. In their motion for reconsideration of the Court's decision that it lacks jurisdiction to reconsider its decision to not award attorney fees, the Xie Parties have asked the Court to reconsider its jurisdiction decision. (ECF No. 22).

3. Based on the authorities cited in their motion for reconsideration of the Court's decision that it lacks jurisdiction, the Xie Parties contend that it is indisputable that the Court has jurisdiction to address the attorney-fee issue on reconsideration and that waiting for a response is unnecessary. But should the Court desire a response, the Xie Parties respectfully request that that Court order the filing of an expedited response on or before October 27, 2021.

4. The Xie Parties seek an expedited response and ruling to avoid their having to appeal the jurisdiction and attorney-fee issues without the Court having had an opportunity to reconsider its two rulings that are the subjects of the two motions for reconsideration.

### **Prayer**

For the above reasons, the Xie Parties ask that, unless the Court grants the Xie Parties' motion for reconsideration of the Court's decision that it lacks jurisdiction to reconsider its decision to not award attorney fees without having received a response, the Court order an expedited response to the motion by October 27, 2021.

Respectfully submitted,

**CURNUTT & HAFFER, L.L.P.**

By: /s/ Stephen W. Kotara

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**CERTIFICATE OF CONFERENCE**

I certify that I conferred with opposing counsel Charles L. Woods about the underlying motion, and because Mr. Woods opposes this motion, it is presumed that he opposes this motion.

/s/ Stephen W. Kotara

Stephen W. Kotara

**CERTIFICATE OF SERVICE**

I certify that this instrument was delivered by electronic service to the following parties and counsel of record on October 20, 2021:

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